

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

SEP 18 2014

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America)

v.)

Case No. M-14-1818-M

Orlando LANDAVERDE-CASANOVA)

YOB: 1990)

POB: Mexico)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 9/17/2014 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

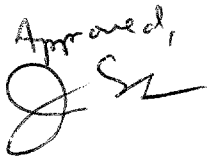
Offense Description

21 U.S.C. 841 (a) 1

Possession with intent to distribute
approximately 320.5 kilograms of
marijuana

This criminal complaint is based on these facts:

On September 17, 2014, at approximately 8:00 a.m., United States Border Patrol Agents observed several individuals with suspected bundles of narcotics make their way across the Rio Grande River near Fronzon, Texas and head north with the bundles on their backs. [See Attachment A]

☒ Continued on the attached sheet.Approved,

Complainant's signature
James Ibarra, DEA Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date:

September 18, 2014
8:40 am

Judge's signature

City and state:

McAllen, Texas

Peter E. Ormsby, U.S. Magistrate Judge

Printed name and title

Attachment "A"

On September 17, 2014, at approximately 8:00 a.m., United States Border Patrol Agents (Aerial Surveillance) observed several individuals with suspected bundles of narcotics make their way across the Rio Grande River near Fronzon, Texas and head north with the bundles on their backs.

The Border Patrol aerial surveillance then observed a black pickup truck travel towards the individuals carrying the suspected narcotics bundles. Shortly after, Border Patrol aerial surveillance advised Border Patrol ground units the truck was headed back north on FM 650, and then turn left onto Alamo Road. Border Patrol aerial surveillance then advised ground units that the truck turned right on Belmontes Alley and parked in front of a residence.

Border Patrol ground units arrived at the residence when the driver absconded from the black pickup truck. Border Patrol Agents chased the driver into a nearby brushy field. Aerial surveillance was maintained on the driver as ground units were directed to his location. At this time, Border Patrol apprehended the driver, identified as Orlando LANDAVERDE-Casanova, and transported him to the Rio Grande City, TX Border Patrol Station.

Border Patrol Agents approached the black pickup truck and observed bundles of suspected marijuana in the bed (plain view) of the pickup truck. Agents positively identified the suspected narcotics as thirty-five packages of marijuana weighing approximately 320.5 kilograms.

DEA Special Agent Antonio De La Cruz, as witnessed by DEA Special Agent James Ibarra, read Orlando LANDAVERDE-Casanova his Miranda Rights at the Rio Grande City Border Patrol Station. Orlando LANDAVERDE-Casanova requested to speak with an attorney. At this time agents discontinued questioning.

SA Ibarra and SA De LA Cruz then reviewed recorded video taken from aerial surveillance and observed the driver of the black pickup truck, wearing a white long sleeved shirt and dark blue jeans, abscond from the black pickup truck and run away from Border Patrol Units. DEA Agents observed surveillance was maintained on the driver as he stopped running and hid under some bushes. Minutes later Border Patrol Agents apprehended the driver.